

DEBORAH M. SMITH
Acting United States Attorney

THOMAS C. BRADLEY
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 W. 7th Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Tel.: 907-271-5071
Fax: 907-271-1500
thomas.bradley@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:05-cr-0072-RRB
)	
Plaintiff,)	
)	GOVERNMENT'S SENTENCING
v.)	MEMORANDUM
)	
JOSE MIGUEL VASQUEZ-CRUZ,)	
)	
Defendant.)	
_____)	

COMES NOW the United States of America, through undersigned counsel,
and files its sentencing memorandum in this case.

The government agrees with the presentence investigation report, and
recommends that the defendant receive a sentence of 57 months. This defendant is
a criminal alien with three prior cocaine convictions, two of which were for crack
trafficking. A gun was present during one of the offenses. He has previously been

deported. He was arrested while trying to obtain identification using a counterfeit social security card. He has evidently used at least eight different names.

This is not a defendant who needs or deserves special treatment. He does not merit sympathy. He has not learned from the revolving door deportation process. He does not merit a high end sentence, but a 57 month sentence would serve to deter him and others.

RESPECTFULLY SUBMITTED this 17th day of April, 2006, at
Anchorage, Alaska.

DEBORAH M. SMITH
Acting United States Attorney

s/ Thomas C. Bradley
Assistant U. S. Attorney
222 West 7th Ave., #9, Rm. 253
Anchorage, AK 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-1500
E-mail: thomas.bradley@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2006,
a copy of the foregoing Government's
Sentencing Memorandum was served
electronically on Lance C. Wells.

s/ Thomas C. Bradley